

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

|                   |   |                  |
|-------------------|---|------------------|
| IN RE:            | : | CHAPTER 13       |
|                   | : |                  |
| Tramell D. Knight | : | No. 17-18197-MDC |
| Debtor            | : |                  |

ANSWER TO MOTION OF PENNSYLVANIA HOUSING FINANCE AGENCY  
FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted some payments were missed. Debtor's home required major structural repairs due to water damage which caused the debtor to not make payments on time. The debtor wishes for Movant to provide their accounting so that debtor may compare it to her records to determine the remaining arrears. The debtor is also prepared to make an August 2020 payment.
7. Debtor is unsure of the same as asks Movant to kindly provide accounting.
8. Denied.
9. No objection to Movant communicating with Debtor.
10. No response required.

WHEREFORE, the Debtor respectfully requests that the Movant's Motion for Relief be DENIED.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor(s)

Dated: 7/28/20

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CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca A. Solarz on behalf of Pennsylvania Housing Finance  
Agency  
Bkgroup@kmlawgroup.com

Dated: 7/28/20

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor